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UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO  
2015 NOV -3 AM 11:38

Reverse Mortgage Solutions, Inc. Plaintiff	CLERK U.S. DISTRICT COURT SAN JUAN, P.R.	CIVIL ACTION NO 3:15-cv-01854-CCC
Vs.  The Estate of Irma Concepción Flores Ferreiro a/k/a Irma C. Flores Ferreiro a/k/a Irma Flores de Tallada a/k/a Irma Flores Tallada a/k/a Irma Flores Ferreiro composed By Manuel Antonio Arroyo Flores and Eddie Arroyo Flores; Richard Doe; Municipal Revenue Collection Center (CRIM); Puerto Rico Treasury Department; United States of America; Mary Doe Defendants		

**ANSWER TO AMENDED MORTGAGE FORECLOSURE COMPLAINT**

TO THE HONORABLE COURT:

HERE COMES DEFENDANT EDDIE ARROYO FLORES, by himself for the cause of action states, alleges and prays the following:

1. Denied for lack of information
2. Denied for lack of specific information
3. Accepted, son of Irma Flores.
4. Accepted
5. Denied for lack of information
6. Denied. The attached mortgage is different from the one referred to in this averment.
7. Denied for lack of information. The attached mortgage does not bear any relationship to the one referred to in this case.
8. Denied for lack of information. Plaintiff must provide the proper original promissory note for this claim.

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9. Denied for lack of information. The attached mortgage does not bear any relation to the one referred to in this case.

10. Denied for lack of information.

11. Denied for lack of information.

12. Denied for lack of information.

13. Denied for lack of information. The attached mortgage does not bear any relation to the one referred to in this case.

14. Denied for lack of information.

15. Denied for lack of information

16. Denied for lack of information.

17. Denied for lack of information.

18. Denied for lack of information.

19. Denied for lack of information.

20. Denied for lack of information.

21. Denied for lack of information.

22. Denied. This claim is not directed to me.

23. Denied. Not true, I am not a legal heir of Irma Concepción Flores Ferreiro.

COUNTERCLAIM N/A

1. Defendant EDDIE ARROYO FLORES is not an heir to Irma Concepcion Flores Ferreiro.
2. Even if he were determined to be an heir he has rejected his inheritance in compliance with Puerto Rican law.
3. Defendant requests he be awarded any sums paid to defend himself from this complaint including interests, expenses, costs, late charge and attorney's fees and costs, to the fullest extent allowed by the law.

## AFFIRMATIVE DEFENSES

1. Lack of personal and/or subject matter jurisdiction.
2. The sum is not certain, nor is it liquid, nor is it collectable.
3. This legal action has prescribed.
4. The claim is frivolous.
5. Plaintiff lacks legal standing. The original signed note must be submitted and shown before this Honorable Court.
6. Defendant is not liable for the note.
7. Defendant is not an heir to Irma Concepción Flores.
8. The debt or obligation does not exist.
9. The debt or obligation is not enforceable.
10. Settlement
11. Assumption of risk.
12. Negligence
13. Illegality
14. There is not a valid cause of action
15. Lack of diligence
16. Plaintiff lacks authorization
17. Res judicata
18. Abuse of process.

WHEREFORE, Defendant EDDIE ARROYO FLORES requests this Court grant the following relief:

- A. Determine this defendant not liable for the alleged debt.

B. Award this defendant any sums paid to protect himself from this complaint, including interests, expenses, costs, late charge and attorney's fees and costs, to the fullest extent allowed by the law.

RESPECTFULLY SUBMITTED on this November 2, 2015 in Guaynabo, PR 00969.



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